

Exhibit B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

NEIMAN MARCUS GROUP LTD LLC, *et al.*,¹

Reorganized Debtors.

)
)
) Chapter 11
)
) Case No. 20-32519 (DRJ)
)
) (Jointly Administered)
)

**ORDER SUSTAINING
LIQUIDATING TRUSTEE'S OBJECTION
TO PROOF OF CLAIM NUMBER 1154 OF MICHAEL VALLE**
(Related Docket No. _____)

Upon the objection (the "Objection") of the Liquidating Trustee seeking entry of this Order disallowing the Valle Claim,² it is **HEREBY ORDERED THAT:**

1. The Objection is **SUSTAINED** as set forth herein.
2. The Valle Claim is hereby disallowed in its entirety.
3. Bankruptcy Management Solutions, Inc. d/b/a Stretto is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

[Remainder of page intentionally left blank]

¹ The reorganized debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is NMG Holding Company, Inc. (5916). The reorganized debtor's service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201. On March 31, 2021, the Bankruptcy Court entered an ordered closing each of the chapter 11 cases of the NMG Holding Company, Inc's affiliates [Docket No. 2371].

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Debtors' Third Amended Joint Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code (With Technical Modifications)* [Docket No. 1793] (the "Plan") or the Objection, as applicable.

4. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

5. The Court shall retain exclusive jurisdiction to resolve any dispute regarding this Order.

Dated: _____, 2022

THE HONORABLE DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE